

### III. REMARKS

Claims 1-18 are pending in this application. By this amendment, claims 1, 8 and 12 have been amended. These amendments are being made to facilitate early allowance of the presently claimed subject matter. Applicants do not acquiesce in the correctness of the rejections and reserve the right to present specific arguments regarding any rejected claims not specifically addressed. Further, Applicants reserve the right to pursue the full scope of the subject matter of the original claims in a subsequent patent application that claims priority to the instant application. Reconsideration in view of the following remarks is respectfully requested.

Entry of this Amendment is proper under 37 C.F.R. 1.116(b) because the Amendment: (a) places the application in condition for allowance as discussed below; (b) does not raise any new issues requiring further search and/or consideration; and (c) places the application in better form for appeal. Accordingly, Applicants respectfully request entry of this Amendment.

In the Office Action, claims 1-18 are rejected under 35 U.S.C. §112, first paragraph, as allegedly failing to comply with the written description requirement. Claims 1-18 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Chouinard (U.S. Patent No. 6,671,701), hereafter "Chouinard," in view of Campbell *et al.* (U.S. Patent No. 6,856,970), hereafter "Campbell," and Brandt *et al.* (U.S. Patent No. 6,714,979), hereafter "Brandt," and further in view of Chen *et al.* (U.S. Patent No. 6,301,681). Applicants traverse the rejection for the following reasons.

**A. REJECTION OF CLAIMS 1-18 UNDER 35 U.S.C. §112, FIRST PARAGRAPH**

The Office has asserted that claims 1-18 fail to satisfy the written description requirement. Specifically, the Office asserts that the subject matter “wherein the document messages transfer information about the back office system,” was not described in the specification in such a way as to reasonably convey to one skilled in the relevant art that the inventors, at the time the application was filed, had possession of the claimed invention.

Applicants, submit that the specification teaches:

At a pre-scheduled time, a batch job is run at the back office end of the system to collect all new and updated documents stored in the back office database. Assume that in this example, there are 600 document creation and update actions collected by this batch job at the pre-scheduled time and that there are three ports (Port#1, Port #2, Port #3) used to convert or generate messages to be sent out to the web-based application through the network. Page 13, lines 6-16.

To this extent, the messages in the example are generated or converted from all new and updated documents stored in the back office database (i.e., information about the back office system).

Accordingly, Applicants submit that the feature is supported by the specification.

The Office further asserts that the subject matter “wherein the method is adapted to process the document messages in an appropriate time sequence even if the timestamp of the previously received document message is more recent than the timestamp of the new inbound message,” was not described in the specification in such a way as to reasonably convey to one skilled in the relevant art that the inventors, at the time the application was filed, had possession of the claimed invention. In response, Applicants submit that one of the stated purposes of the invention is “...eliminating the consistency problems arising from inbound messages being processed out of their proper time sequence.” Page 4, lines 10-16. Furthermore, page 6, lines 12-19 illustrates one method for accomplishing this goal. Thus, Applicants respectfully submit

that the feature is supported by the specification. Accordingly, Applicants request withdrawal of the rejection.

**B. REJECTION OF CLAIMS 1-18 UNDER 35 U.S.C. §103(a)**

With regard to the 35 U.S.C. §103(a) rejection over Chouinard, Campbell, Brandt, and Chen Applicants initially assert that the combined features of the cited art fail to teach each and every feature of the claimed invention. For example, with respect to independent claims 1, 8 and 12 the cited references fail to teach or suggest that the document messages transfer information about the back office system for integrating the first back office system and the web-based application. The Office equates the files of data in Chouinard with the document messages as included in the claimed invention. However, the files of data in Chouinard are statically stored in the file server and as such are not messages. Furthermore, the file server of Chouinard is not an application, much less a web based application. Furthermore, the files of data in Chouinard do not transfer information about the first back office system for integrating the first back office system and the web-based application. Nowhere, does Chouinard teach that its files of data are messages that transfer information about the back office system for integrating the back office system and the web-based application. In contrast, the claimed invention includes "...the document messages transfer information about the first back office system for integrating the first back office system and the web-based application." Claim 1. As such, the document messages of the claimed invention are not simply files in a static source directory as in Chouinard, but instead transfer information about the first back office system for integrating the first back office system and the web-based application. Furthermore, in contrast to the static

nature of the Chouinard files, the document messages of the claimed invention are messages, and as such, are sent from one location to another. Thus, the document messages as included in the claimed invention are not taught or suggested by the files in a source directory in Chouinard. Neither Campbell nor Brandt cures this deficiency. Accordingly, Applicants respectfully request that the Office withdraw its rejection.

With still further regard to independent claims 1, 8 and 12, Applicants assert that the cited references fail to teach or suggest that the method is adapted to process the document messages in an appropriate time sequence even if the timestamp of the previously received document message is more recent than the timestamp of the new inbound message. The Office admits that Chouinard, Campbell and Brandt do not explicitly disclose this feature. Instead, Office cites a passage in Chen, which teaches “[t]he message priority indicates the order in which messages are processed, with higher priority messages being processed before lower priority messages.” Col. 7, lines 27-29. As such, Chen teaches processing messages according to priority and not processing messages in a proper *time* sequence. In contrast, the present invention includes “...wherein the method is adapted to process the document messages in an appropriate time sequence even if the timestamp of the previously received document message is more recent than the timestamp of the new inbound message.” Claim 1. As such the processing of the document message of the claimed invention does not merely process messages according to priority as does Chen, but rather is adapted to process the document messages in an appropriate *time* sequence even if the timestamp of the previously received document message is more recent than the timestamp of the new inbound message. For example, if a message *A* is created prior to a message *B* (and therefore message *A* has a time stamp that is before message *B*) but message *B* is

received at the web-based application before message *A*, the messages are still processed in the correct time sequence. Thus, the processing of the document messages as included in the claimed invention is not taught or suggested by the priority message processing of Chen. Accordingly, Applicants respectfully request that the Office withdraw its rejection.

With regard to claims 2, 14 and 16, Applicants submit that, contrary to the Office's assertion, Chouinard fails to teach or suggest that the primary key comprises document type information and document identification information. Instead, the passage of Chouinard cited by the Office teaches that "...the date and time stamps of all of these source files are compared against the database that contains file name, date and time information for converted or destination files." Col. 2, lines 14-44. To this extent, the Chouinard database contains only two types of information, namely file name and date and time information. Chouinard does not teach a primary key that is separate from the timestamp and includes both document type information and document identification information. Furthermore, Chouinard only teaches documents of one type, that is CAD documents, and Chouinard does not teach that this document type information is included in a primary key. Nowhere, in this passage or elsewhere does Chouinard teach or suggest a primary key that comprises document type information and document identification information. In contrast, the claimed invention includes "...the primary key comprises document type information and document identification information." Claim 2. As such, the primary key as included in the claimed invention is not simply a time and date stamp as in Chouinard, but instead is separate from the timestamp and includes both document type and document identification information. For the above stated reasons, the features of Chouinard cited by the Office are not equivalent to the primary key as included in the claimed invention.

Neither Campbell nor Brandt cures this deficiency. Accordingly, Applicants request that the Office withdraw its rejection.

Furthermore, as argued previously by Applicants, there is no motivation to combine the Chouinard and Brandt references. One of the stated objects in Chouinard is to simplify and automate the file conversion process. Adding the database of Brandt would only add an additional component to the system without providing additional functionality, which is in opposition to Chouinard's stated goal of simplicity. Accordingly, the combination of the database in Brandt with the Chouinard system would destroy the stated purpose of Chouinard, namely, simplicity. In addition, neither Chouinard nor Brandt addresses the problem that is solved by the claimed invention, that is, synchronizing inbound messages to avoid the problems caused by messages arriving in a system in an incorrect order. Accordingly, the combination of Chouinard with Brandt to solve this problem is not obvious. For the above reasons, the Office has failed to provide a *prima facie* case of obviousness. Accordingly, Applicants request withdrawal of the rejection.

Still further, Applicants submit that there is no motivation to combine Chen with Chouinard. Chouinard deals with a static file stored in a file server. In contrast, Chen is concerned with transfer of message between systems. As such the two are in non-analogous fields of art. For this reason, the Office has failed to provide a *prima facie* case of obviousness. Accordingly, Applicants request withdrawal of the rejection.

With regard to the Office's other arguments regarding dependent claims, Applicants herein incorporate the arguments presented above with respect to independent claims listed above. In addition, Applicants submit that all dependant claims are allowable based on their own

distinct features. However, for brevity, Applicants will forego addressing each of these rejections individually, but reserve the right to do so should it become necessary. Accordingly, Applicants respectfully request that the Office withdraw its rejection.

#### **IV. CONCLUSION**

In addition to the above arguments, Applicants submit that each of the pending claims is patentable for one or more additional unique features. To this extent, Applicants do not acquiesce to the Office's interpretation of the claimed subject matter or the references used in rejecting the claimed subject matter. Additionally, Applicants do not acquiesce to the Office's combinations and modifications of the various references or the motives cited for such combinations and modifications. These features and the appropriateness of the Office's combinations and modifications have not been separately addressed herein for brevity. However, Applicants reserve the right to present such arguments in a later response should one be necessary.

In light of the above, Applicants respectfully submit that all claims are in condition for allowance. Should the Examiner require anything further to place the application in better condition for allowance, the Examiner is invited to contact Applicants' undersigned representative at the number listed below.

Respectfully submitted,

Date: December 14, 2005

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Ronald A. D'Alessandro  
Reg. No.: 42,456

Hoffman, Warnick & D'Alessandro LLC  
Three E-Comm Square  
Albany, New York 12207  
(518) 449-0044  
(518) 449-0047 (fax)

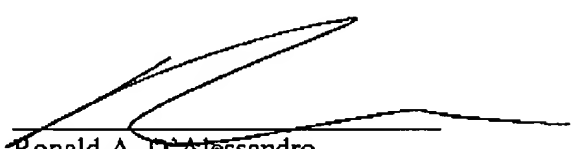
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Ronald A. D'Alessandro  
Reg. No.: 42,456

Hoffman, Warnick & D'Alessandro LLC  
Three E-Comm Square  
Albany, New York 12207  
(518) 449-0044  
(518) 449-0047 (fax)

RAD/hew